

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

“BARBARA;” “SARAH,” by guardian, parent,
and next friend “SUSAN;” and “MATTHEW,”
by guardian, parent, and next friend “MARK;” on
behalf of themselves and all those similarly
situated,

Case No. 1:25-cv-244

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States, in his official capacity, *et al.*,

Defendants.

**PLAINTIFFS’ MOTION TO PROCEED
PSEUDONYMOUSLY**

Plaintiffs Barbara, Sarah, Susan, Matthew, and Mark, by and through their counsel, respectfully move this Court to permit them to proceed pseudonymously due to the increased risk of danger they and their party and non-party family members (including minor children) would face if their information were to be publicly disclosed. Approving this motion will safeguard Plaintiffs’ privacy as well as their physical and emotional wellbeing without prejudicing Defendants or the public.

In support of this motion, Plaintiffs state the following:

1. Plaintiffs are children and parents of current and future children who are or will be denied United States citizenship by Executive Order No. 14,160 entitled “Protecting the Meaning and Value of American Citizenship” (“the Order”). *See* Exec. Order No. 141,160, 90 Fed. Reg. 8499 (Jan. 29, 2025).
2. As set forth in the memorandum of law accompanying this motion, the applicable factors

courts consider in determining whether to permit a party to proceed pseudonymously warrant granting Plaintiffs that relief. Several Plaintiffs have faced persecution, and all Plaintiffs face potential retaliation, including but not limited to arrest, imprisonment, and deportation. Any disclosure of personal information could result in further violence and retaliation to Plaintiffs and their party and non-party family members (including minor children). Using pseudonyms would grant Plaintiffs the security, safety, and peace of mind to continue with this action.

3. Plaintiffs' privacy interests outweigh any public interest in revealing their legal names to the public.
4. For the foregoing reasons, as well as those expressed in the accompanying memorandum of law, Plaintiffs respectfully urge this Court to GRANT this motion and permit them to proceed under a pseudonym.

CERTIFICATE OF CONCURRENCE

5. Pursuant to Local Rule 7.1(c), undersigned counsel for Plaintiffs certify that Plaintiffs have made a good faith attempt to obtain concurrence in the relief sought. Plaintiffs sought concurrence on June 27, 2025, and Defendants have not yet provided a position at the time of filing.

Dated: June 27, 2025

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Respectfully submitted,

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**Application for admission pro hac
vice forthcoming*

***Application for admission pro hac
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law in New Jersey. Not a member of
D.C. bar. Supervised by a member of the
D.C. Bar.*

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